

**REMARKS**

Claims 1, 2 and 4-9 are pending. Claims 3 and 10-18 have been canceled.

Claims 1, 2, 4, 8 and 9 are rejected under 35 USC 102(e) as being anticipated by Chowdry, U.S. Patent No. 6,605,399. This rejection is respectfully traversed.

Applicants previously submitted that the transfer belt 516 does not correspond to the claimed image bearing body. In response, the Examiner asserts that Applicants' own specification explains that the transfer belt (element 14 of the instant application) is the image bearing body, and thus the transfer belt 516 of Chowdry must also be an image bearing body. Applicants respectfully disagree.

Chowdry discloses "a color imaging apparatus wherein color separation images are formed in each of four color modules and transferred in register from toner image-bearing members to a receiver member as the receiver is moved through the apparatus while supported on a receiver member transport web 516" (col. 8, lines 34-39). This portion of Chowdry clearly teaches that the toner images are born not on the transport web 516 but on a sheet 512 transported by the transport web 516. Therefore, as asserted previously, web 516 does not bear images and does not correspond to the claimed image bearing body.

However, notwithstanding the above, even assuming that the transport web 516 corresponds to the claimed image bearing body, only the PC drums 503 could then be interpreted as corresponding to the claimed rotary member. This is because claim 1 recites that the rotary member is in contact with a surface (on which toner exists) of the image bearing body and only the PC drums 503 are in contact with top side surface of the transport web 516 in Fig. 8 of Chowdry. Further, if the PC drums 503 were interpreted as corresponding to the rotary member, an element disclosed in Chowdry corresponding to a conductive member of the present invention needs to be electrically connected to a power supply 552 because claim 1 recites that "one of the rotary member and the conductive member" is connected to the d.c. power supply with "the other" being grounded and the PC drums 503 are grounded. Therefore, pressure rollers 521 must be interpreted as

corresponding to the claimed conductive member because only the pressure rollers 521 make contact with the transport web 516 and are electrically connected to the power supply 552.

Under this supposition, the relationship between the elements disclosed in Chowdry and elements recited in claim 1 are as follows:

Claim 1	Chowdry
image bearing body	endless receiver member transport web 516
rotary member	PC drum 503
conductive member	pressure roller 521
d.c. power supply	power supply 552

An electric field generated between the pressure roller 521 and the transport web 516 by the power supply 552 is directed so as to exert a force for urging the toner of a normal charging polarity toward the pressure roller 521. On the other hand, relating to the conductive member (to which the pressure roller 521 corresponds under the supposition), claim 1 recites that “a second electric field in a direction reverse to the first electric field is generated between the conductive member and the image bearing body.” Further, claim 1 recites that the first electric field is directed so as “to exert a force for adsorbing the toner of a normal charging polarity to the rotary member is generated between the rotary member and the image bearing body.” Accordingly, the direction of the electric field between the pressure roller 521 and the transport web 516, and the direction of the electric field between the conductive member and the image bearing body are entirely opposite. This means that the supposition above results in a logical contradiction. Hence, the features of claim 1 are not taught or suggested by Chowdry.

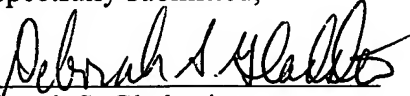
The remaining claims are allowable at least due to their respective dependencies. Applicants request that this rejection be withdrawn.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection

with the filing of this document to Deposit Account No. 03-1952 referencing docket no.  
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Respectfully submitted,

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